

## REMARKS

This paper is a timely response to the Office Action Made Final mailed March 13, 2009 (“the Final Rejection”) to provoke an Advisory Action.

In the Final Rejection, the Examiner states that “Muller respectfully discloses distributing a global clock (Fig. 2, the common time reference 20) to a first master device (Fig. 1, item 2) from the plurality of master devices wherein said first master device operates according to a local clock that is independent of said global clock (column 2, paragraphs [0030], and paragraph [0038])”. See Final Rejection at page 2.

Claim 1 recites, in part, “distributing a global clock to a first master device from the plurality of master devices”. Muller, as alleged, does not teach distributing a global clock to a first master device from **the plurality of master devices**.

FIG. 1, item 2, cited above in the Final Rejection, does not show distributing a global clock to a first master device from the plurality of master devices as set forth in claim 1. FIG. 1 only shows one master device (i.e., transmitter 2 - SYNC. MASTER) and one slave device (i.e., receiver 6 - SYNC. SLAVE).

FIG. 2 does not show distributing a global clock to a first master device from the plurality of master devices as set forth in claim 1. FIG. 2 only shows one master device 2 and one slave device 6.

The attention of the Examiner is respectfully drawn to FIG. 1. Note that FIG. 1 shows that device 2 is a “SYNC. MASTER” and that device 6 is a “SYNC. SLAVE”. Now the attention of the Examiner is respectfully drawn to paragraph [0029] which describes FIG. 1. Device 2 is called “transmitter device 2” and device 6 is called “receiver device 6”. See, e.g., paragraph [0029].

Thus, according to Muller, transmitter 2 in FIG. 1 is a MASTER.

Thus, according to Muller, receiver 6 in FIG. 1 is a SLAVE.

Now, the attention of the Examiner is respectfully drawn back to FIG. 2. Note that the transmitter has a reference number of 2; and that the receiver has a reference number of 6.

Thus, in FIG. 2 of Muller, transmitter 2 is a MASTER.

Thus, in FIG. 2 of Muller, receiver 6 is a SLAVE.

There is no plurality of master devices as set forth in claim 1.

Neither FIG. 1 or FIG. 2 of Muller shows a plurality of master devices as set forth in claim 1.

Paragraph [0030], cited above in the Final Rejection, describes the transmitter 2 in FIG. 1 and the receiver 6 in FIG. 1.

However, as discussed above, according to Muller, transmitter 2 in FIG. 1 is a MASTER.

As discussed above, according to Muller, receiver 6 in FIG. 1 is a SLAVE.

Thus, paragraph [0030] does not teach a plurality of master devices as set forth in claim 1.

Paragraph [0038], cited above in the Final Rejection, describes that a “transmitter may send audio, video or data to the receiver, together with a Real Time stamp”. See Muller at paragraph [0038]. The same paragraph [0038] later refers to “transmitter 2” and “receiver 6”.

As noted before, according to Muller, transmitter 2 is a MASTER.

As noted before, according to Muller, receiver 6 is a SLAVE.

Thus, paragraph [0038] does not teach a plurality of master devices as set forth in claim 1.

Muller, as alleged, does not teach a plurality of master devices as set forth in claim 1.

In fact, Muller at paragraph [0040] definitively states that “[t]here is only one master in a network”.

Muller, as alleged, does not teach a plurality of master devices as set forth in claim 1.

In view of the above analysis of Muller, it is respectfully submitted that the *prima facie* case of obviousness has not been presented since Taylor, as alleged, does not overcome the teaching deficiencies of Muller.

It is respectfully requested that the Examiner reconsider the rejections of claims 1-30.

*In view of the above discussions, it is respectfully requested that the Examiner reconsider the arguments and/or rebuttal evidence presented in the Amendment filed January 13, 2009, which is reproduced below as a courtesy:*

Claims 1-30 stand rejected under 35 U.S.C. § 103(a) as being obvious over United States Patent Publication No. 2002/0031196 A1 to Thomas Muller et al. ("Muller") in view of U.S. Patent Publication No. 2002/0131398 A1 to James L. Taylor ("Taylor"). Applicant respectfully traverses the rejection for at least the reasons as set forth below.

It is respectfully submitted that the combination of Muller and Taylor, as alleged, does not teach each and every element as set forth in claim 1. For example, claim 1 recites, in part, "determining an offset between said global clock and said local clock; and distributing said offset to at least one master device other than said first master device".

The Office Action at page 3 indicates that Muller does not teach at least "distributing said offset to at least one master device other than said first master device" as set forth in claim 1.

However, the Office Action at page 4 specifically proposes Taylor at paragraphs [40]-[41] to make up for the admitted teaching deficiencies of Muller. Applicant respectfully disagrees.

Taylor at paragraphs [40]-[41] does appear to describe a change in a free running clock offset FRCO that is a function of the received global time reference GTR and the current local

time reference LTR stored in the device. However, the device does not perform “distributing said offset to at least one master device other than said first master device”. The device merely stores the FRCO locally (see, e.g., Taylor at paragraph [0038]) and ***does not distribute the offset***.

In fact, if anything is distributed, it appears that the local time reference of the transmitter is transmitted. The attention of the Examiner is respectfully directed to Taylor at paragraph [0030].

For at least the above reasons, it is believed that the combination of Muller and Taylor, as alleged, does not teach each and every element as set forth in claim 1.

In addition, it is respectfully submitted that Muller does not teach what is alleged in the Office Action.

For example, it is respectfully noted that, although, on the one hand, claim 1 relates to a method for distributing timing information amongst a plurality of master devices; on the other hand, Muller relates to synchronization between a master and a slave.

Thus, the items relied upon in Muller in support of a *prima facie* case of obviousness are not elements of a method for distributing timing information *amongst a plurality of master device*; but are instead elements relating to *synchronization between a master and a slave*.

Thus, the evidence on which the Examiner relies relates to synchronization between a master and a slave and not distributing timing information amongst a plurality of master devices. Thus, it is respectfully submitted that the Examiner has not provided evidence in Muller relating to distributing timing information amongst a plurality of master devices.

In fact, Muller is rather specific and states that “[t]here is only one master in a network”. See, e.g., Muller at paragraph [0040].

Thus, the Examiner’s evidence in the form of particular items illustrated in FIG. 1 and FIG. 2 of Muller do not relate to distributing timing information *amongst a plurality of master devices*, but instead relate to *synchronization between a master and a slave*.

Similarly, the Examiner's evidence in the form of citations to the specification of Muller such as, for example, paragraphs [0030], [0038], etc., do not relate to distributing timing information amongst a plurality of master devices, but instead relate to synchronization between a master and a slave.

For at least the above reasons, Muller does not teach the elements as set forth in claim 1 as alleged in the Office Action.

For at least the above reasons, it is respectfully submitted that an obviousness rejection based on the combination of Muller and Taylor, as alleged, cannot be maintained.

It is therefore respectfully requested that the rejection under 35 U.S.C. § 103(a) be withdrawn with respect to claim 1 and its rejected dependent claims (i.e., claims 2-9).

Claim 10 recites, for example, "distributing said offset to a second master device selected from the plurality of master devices".

Accordingly, the same or similar arguments as made with respect to claim 1 are also made, if applicable, with respect to claim 10.

For at least the above reasons, it is respectfully submitted that an obviousness rejection based on the combination of Muller and Taylor, as alleged, cannot be maintained.

It is therefore respectfully requested that the rejection under 35 U.S.C. § 103(a) be withdrawn with respect to claim 10 and its rejected dependent claims (i.e., claims 11-14).

Claim 15 recites, for example, "wherein said offset is distributed to at least one of said master devices".

Accordingly, the same or similar arguments as made with respect to claim 1 are also made, if applicable, with respect to claim 10.

For at least the above reasons, it is respectfully submitted that an obviousness rejection based on the combination of Muller and Taylor, as alleged, cannot be maintained.

It is therefore respectfully requested that the rejection under 35 U.S.C. § 103(a) be withdrawn with respect to claim 15 and its rejected dependent claims (i.e., claims 16-22).

Claim 23 recites, for example, “wherein said offset is available to other of said master devices via said communication pathway”.

In addition to the same or similar arguments made with respect to claim 1 that are also made, if applicable, with respect to claim 23, Applicant respectfully notes that there is no mention in Taylor at paragraphs [40]-[41] of the FRCO stored locally in a register in the device being available to other of said master devices.

For at least the above reasons, it is respectfully submitted that an obviousness rejection based on the combination of Muller and Taylor, as alleged, cannot be maintained.

It is therefore respectfully requested that the rejection under 35 U.S.C. § 103(a) be withdrawn with respect to claim 23 and its rejected dependent claims (i.e., claims 24-30).

Applicant does not necessarily agree or disagree with the Examiner’s characterization of the documents made of record, either alone or in combination, or the Examiner’s characterization of recited claim elements. Furthermore, Applicant respectfully reserves the right to argue the characterization of the documents of record, either alone or in combination, to argue what is allegedly well known, allegedly obvious or allegedly disclosed, or the characterization of the recited claim elements should that need arise in the future.

With respect to the present application, Applicant hereby rescinds any disclaimer of claim scope made in the parent application or any predecessor or related application. The Examiner is advised that any previous disclaimer of claim scope, if any, and the alleged prior art that it was made to allegedly avoid, may need to be revisited. Nor should a disclaimer of claim scope, if any, in the present application be read back into any predecessor or related application.

In view of at least the foregoing, it is respectfully submitted that the present application is in condition for allowance. Should anything remain in order to place the present application in condition for allowance, the Examiner is kindly invited to contact the undersigned at the below-listed telephone number.

The Commissioner is hereby authorized to charge any additional fees, to charge any fee

U.S. Application No. 09/935,082, filed August 21, 2001  
Attorney Docket No. 15975US01  
Response AF dated May 13, 2009  
In Response to Office Action Made Final mailed March 13, 2009

deficiencies or to credit any overpayments to the deposit account of McAndrews, Held & Malloy, Account No. 13-0017.

Date: May 13, 2009

Respectfully submitted,

/Michael T. Cruz/  
Michael T. Cruz  
Reg. No. 44,636

McANDREWS, HELD & MALLOY, LTD.  
500 West Madison Street, Suite 3400  
Chicago, Illinois 60661  
Telephone: (312) 775-8000  
Facsimile: (312) 775-8100